

To: Skophammer, Stephanie[SKOPHAMMER.STEPHANIE@EPA.GOV]
Cc: Foresman, Erin[Foresman.Erin@epa.gov]; Vendlinski, Tim[vendlinski.tim@epa.gov]; Goforth, Kathleen[Goforth.Kathleen@epa.gov]
From: Enos, Cassandra@DWR
Sent: Tue 12/9/2014 12:02:50 AM
Subject: RE: Proposed Topics for add'l technical meeting
[EPA mtg notes 111314 final.docx](#)
[EPA mtg notes 111014 final.docx](#)
[EPA mtg notes 112414 final.docx](#)

Stephanie – Thanks much for getting back to me. Attached are the summaries of action items from each of the meetings. I apologize for the delay in getting these back to you. I'm happy to work on setting up another technical meeting before the 15th. Are there any particular days/times that work best for you? In the meantime, we will start working on written responses with the goal of having those done before the technical meeting. Let me know if you have any questions on the action items.

Thanks, Cassandra

From: Skophammer, Stephanie [mailto:SKOPHAMMER.STEPHANIE@EPA.GOV]
Sent: Friday, December 05, 2014 10:19 AM
To: Enos, Cassandra@DWR
Cc: foresman.erin@epa.gov; vendlinski.tim@epa.gov; Goforth, Kathleen
Subject: Proposed Topics for add'l technical meeting

Hi Cassandra-

I think we are on deck for providing suggestions to you on how we would like to handle the remaining topics that have not been covered at our technical meetings. After going through the bullets, we would like to have one more technical meeting (see proposed agenda below), and a written response provided by DWR/ICF/lead federal agencies for the rest of the bullets will probably suffice.

I don't know the likelihood of getting the last technical meeting accomplished before the holidays, but it probably could be shorter than 3 hours so that may help. However, we would like to have it before Jan 15, the date of the next policy meeting.

Additionally, we are still very much interested in creating a formal agreed-upon summary from the 3 technical meetings. I drafted one for EPA management that I am happy to share with you to further progress towards this goal as it is important to us to do it.

Thank you and let me know what additional things you need from me, I am happy to help facilitate.

Stephanie

Proposed Agenda for Last Technical Meeting:

- EPA is concerned that the relationship between the CM2 analysis and the current Reclamation planning efforts in Yolo Bypass are not clearly enough defined, including additional project-level analysis, relationship to BiOp, and if additional water would be needed to flood the bypass.

We raised this at our last meeting, in that we would like to learn more about CM2 and whether the impacts of CM2 are designed to offset impacts from CM1.

- How will programmatic benefits to resident and migratory fishes from CM2 and CM4 be estimated and compared to estimated negative effects of CM1, CM2, and CM4?

Related to above. EPA is still very much interested in this discussion and its direct relation to CM2.

- EPA concerned that BDCP and DEIR/EIS do not include adequate detail regarding export operations. In the south Delta, more detail is sought in regards to the Corps permit for SWP Banks operations and how BDCP use of that facility would meet Corps' goal of minimizing erosion. Additionally a description of CVP/SWP operations with and without each alternative should be included in Chapter 3 and add more detail to the north Delta bypass rules description. EPA also seeks clarification regarding E/I ratio used for BDCP.

Suggestion for a topic of discussion. We would like to learn more about this.

Remaining Bullets where a written response may be sufficient:

From Proposed Technical Meeting #4

- EPA concerned that the DEIR/EIS does not provide enough detail regarding the potential outcomes of the system impact studies and how that may affect procurement and placement of transmission and associated infrastructure, and associated terrestrial effects.

This comment was made on the DEIS, but we understand that add'l work has been completed since then to strengthen the terrestrial section. Has ICF made any progress with USFWS regarding this concern?

- EPA is concerned that the extent of wetlands, vernal pools, and waters have been underestimated. The extent of wetlands in the study area were determined based primarily on aerial mapping and the DEIR/EIS does not provide an estimate of the GIS-based mapping accuracy.

We can table this discussion for a future meeting.

- EPA concerned that the DEIS air quality analysis did not adequately evaluate all conservation measures for general conformity.

We understand (from the BECT meeting) that the air quality analysis is being redone.

- EPA concerned that the DEIR/EIS does not discuss effects on downstream resources or how Delta operations could require changes in upstream operations.

We understand from previous meetings that ICF is expanding their analysis to include downstream resources and will include a more robust discussion (however, not add'l analysis) of changes to upstream operations.

- Discuss how the decision rules will be described to determine impact determinations.

ICF indicated that they are revising and clarifying this for the Supplemental. EPA would like to be involved in reviewing the revisions to make sure we fully understand the decision-making process prior to a public release of the Supplemental.

- EPA concerned that, in some cases, different NEPA effects determinations are provided for similar analyses and some NEPA conclusions were not provided. EPA is concerned that in-water construction BMPs are not clearly enough defined or may not be feasible or applicable on the scale required for BDCP.

ICF indicated that they are revising and clarifying this for the Supplemental.

- What is planned for dredged material and reuseable tunnel material?

ICF indicated that more detail was being provided for this in the Supplemental.

- Discuss whether any additional information will be provided on energy usage for the BDCP and CVP/SWP system.

Is ICF planning to address this in the Supplemental?

From Proposed Technical Meeting #5

- EPA is concerned that the DEIS discussion of groundwater use changes as a result

of surface water deliveries is not adequate. BDCP should consider including a mitigation measure for groundwater management in southern San Joaquin Valley.

This was not discussed at a technical meeting, but we heard that it was discussed at the Policy Meeting #1 and that DWR is planning to have a discussion of the BDCP in the context of new groundwater legislation for the Supplemental.

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